

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

EDGEWOOD HIGH SCHOOL
OF THE SACRED HEART, INC.,
Plaintiff,

v.

CITY OF MADISON, WISCONSIN;
CITY OF MADISON ZONING BOARD
OF APPEALS; CITY OF MADISON
PLAN COMMISSION; and CITY OF
MADISON COMMON COUNCIL;
Defendants.

Case No. 3:21-CV-118

SECOND DECLARATION OF SARAH A. ZYLSTRA

I, Sarah A. Zylstra, under penalty of perjury, declare as follows:

1. I am an attorney representing the Defendants in the above-reference matter. I offer this second declaration in support of Defendants' Motion to Declare Discovery Closed or, in the alternative, to Limit the Search for Records.

2. Attached to this Declaration as Exhibit A is a true and correct copy of email correspondence between myself and Attorney Ingrisano from September 27 and 28, 2022 related to Edgewood High School's proposed search for City records.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this 28th day of September, 2022.

/s/ Sarah A. Zylstra
Sarah A. Zylstra